

Appln. No. 09/994,544  
Amdt. dated July 26, 2005  
Reply to Office Action of May 26, 2005  
Docket No. DE9-2000-0031 (267)

**REMARKS/ARGUMENTS**

These remarks are made in response to the final Office Action of May 26, 2005 (Office Action). As a result of this amendment, claims 1, 8, 13, 18 and 19 have been amended and claims 4, 5, and 15-17 have been cancelled. As this response is timely filed within the 3-month shortened statutory period, no fee is believed due.

In paragraphs 1-2, claims 1 and 13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,515,490 to Buchanan, *et al.* (Buchanan) in view of U.S. Patent No. 5,649,060 to Ellozy, *et al.* (Ellozy). Claims 1 and 13 (as well as claim 8) have been amended to include the limitation of aligning at least one version of content with a first representation to produce a web of relations between a structural view of at least one version of content and the first representation.

Buchanan discusses a method and system for temporally formatting data presentations in time-dependent documents. The main focus of Buchanan is the generation and scheduling of time-dependent multi-media presentations and therefore the structural information in Buchanan is primarily the temporal metadata of the media item. Notwithstanding that Ellozy notes that a summary script and speech data most often do not have time correlation, Ellozy does discuss using time stamps associated with anchor points and therefore does not lack temporal information (as recited in claim 3). Furthermore, neither Ellozy nor Buchanan discusses aligning at least one version of

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content with a first representation to produce a web of relations between a structural view of at least one version of content as currently recited in claims 1 and 13.

Regarding paragraph 4 of the Office Action, claims 4-5 and 16-17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan, Ellozy, and Kim, in view of another publication, "Cooperative Use of MHEG-5 and HyTime" by Rutledge, *et al.* (Rutledge). Such combination still fails to obviate the claims of the present invention due to the noted deficiencies in Buchanan and Ellozy noted above and further in the view that Rutledge further fails to suggest, mention or contemplate a web of relations as recited in the claims of the present invention. Rutledge discusses complex hyperlinking, but it appears to fail to suggest, mention or contemplate the steps of aligning a version of content with a first representation to produce a web of relations between a structural view of a version of content with and the first representation. There is only a nebulous discussion of complex hyperlinking and it would appear a piecemeal combination of references to use Buchanan, Ellozy, and Rutledge in an attempt to obviate the claims as currently recited. Where in the Abstract of Rutledge or elsewhere is there a discussion of a web of relations between a structural view of a version of content and a first representation?

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The prior element of claim 4 (now incorporated in claims 1, 8 and 13) in particular recites aligning at least one version of content (of the realization) with the first representation to produce a web of relations. In paragraph 2 of section 2 of Rutledge, there is discussion of two attributes that enable one element to refer to one another. Applicants once again assert that this fails to suggest the web of relations between a version of content of a relation and a first representation as claimed in the present invention.

Regarding paragraph 5 of the Office Action, claims 6 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan, Ellozy, Kim, Rutledge, in view of U.S. Patent No. 5,731,847 to Tsukagoshi, *et al.*, (Tsukagoshi), and to U.S. Patent 5,794,197 to Alleva, *et al.* (Alleva) and finally in view of the publication "Using the Strategy Design Pattern to Compose Reliable Distributed Protocols", by Garbinato, *et al.* (Garinato). Note, the elements of these claims are now incorporated into amended independent claims 1, 8 and 13. Once again, such combination fails to obviate the claims of the present invention due to the noted deficiencies in Buchanan and Kim and Ellozy noted above. Furthermore, Applicants believe that there is no demonstrated suggestion or motivation to combine in order to obviate the claims of the present invention. In any event, even if one were to combine such references, such combination still fails to suggest, mention or contemplate the realization, the first representation, and the second representation using the semantic structure as recited in the amended claims.

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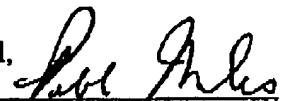
Regarding paragraphs 6-10, the Applicants once again reiterates the arguments provided above, particularly in the reliance of the Buchanan, Ellozy and Kim references. Other references in the Office Action by the Examiner have been reviewed, but do not appear to further affect the patentability of the claims of the present invention.

In light of the foregoing, withdrawal of the 35 U.S.C. § 103(a) rejections with respect to the claims is respectfully requested. As none of the references either singly, nor in any combination thereof, teaches or suggests the features of the present invention as claimed as amended, withdrawal of the rejections regarding the pending claims is once again respectfully requested in view of the amendments herein.

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Response, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

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Respectfully submitted,



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